

ORIGINAL

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
 WASHINGTON, D.C. 20554

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SEP 21 1998

FEDERAL COMMUNICATIONS COMMISSION
 DEPT. OF THE TREASURY

In the Matter of)
)
 Amendment of Section 73.202(b))
 Table of Allotments)
 FM Broadcast Stations)
 (Pauls Valley, Oklahoma))

MM Docket No. 98-140
 RM-9294

To: Chief, Allocations Branch
 Policy and Rules Division
 Mass Media Bureau

COMMENTS AND COUNTERPROPOSAL OF SUELOU, INC.

Suelou, Inc., by its undersigned counsel, hereby respectfully submits these comments and counterproposal in the above-captioned proceeding.

1. Pauls Valley, Oklahoma, presently has two local aural broadcast services assigned to it, KGOK(AM) and KGOK-FM. KGOK-FM operates on the present FM channel 249C3 allotment to Pauls Valley. Thus, the proposed FM channel 283A allotment would provide Pauls Valley with its third local aural broadcast service. Moreover, the proposed allotment requires a site restriction in order to comply with the Commission's minimum separation requirements to avoid a short-spacing to Station KMGL, Oklahoma City, Oklahoma.

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 List A B C D E

2. Suelou, Inc. proposes to have FM channel 283A assigned to Wynnewood, Oklahoma as that community's first local broadcast service. Wynnewood, Oklahoma is located in Gavin County and had a 1990 population of 2,393 persons. As shown in the attached engineering study by Lechman & Johnson, Inc., FM channel 283A can be assigned to Wynnewood from the referenced coordinates for that community, and without a site restriction.

3. Should the Commission assign FM channel 283A to Wynnewood, Suelou, Inc. will submit an application for a construction permit to utilize the assignment, or take whatever action is necessary to participate in a competitive bidding process for the channel in accordance with MM Docket No. 97-234. In the event that Suelou, Inc. is issued a construction permit for the channel it will promptly build the station and place it into operation.

4. Wherefore, Suelou, Inc. respectfully requests that the Commission modify its FM Table of Allotments, Section 73.202(b) of the Commission's Rules, to read as follows:

<u>City</u>	<u>Channel No.</u>	
	<u>Present</u>	<u>Proposed</u>
Wynnewood, Oklahoma	---	283A

Respectfully submitted,

Suelou, Inc.

By: 

Its Attorney

Southmayd & Miller
1220 Nineteenth Street, N.W.
Suite 400
Washington, D.C. 20036
(202) 331-4100

Date: September 21, 1998

**COUNTER PROPOSAL TO
MM DOCKET NO. 98-140, RM-9294**

**Prepared For
SUELOU, INC.**

August 24, 1998

Lechman & Johnson, Inc.

DECLARATION

ENGINEERING STATEMENT

Peter W. Lechman says that he is an engineer and President of Lechman & Johnson, Inc., Telecommunications consultants, with offices located at 9049 Shady Grove Court, Gaithersburg, Maryland 20877 and that his qualifications are a matter of record with the Federal Communications Commission.

That the firm of Lechman & Johnson, Inc. has been retained by Suelou, Inc., to prepare this Engineering Statement in support of a counter proposal to MM Docket No. 98-140, RM-9294 to assign FM Channel 283A to Pauls Valley, Oklahoma. In the Notice of Proposed Rule Making, the amendment of Section 73.202(b) of the TABLE of Allotments are as follows:

<u>Community</u>	<u>Present Allocations</u>	<u>Proposed Allocations</u>
Pauls Valley	249C3	249C3, 283A

Suelou, Inc. proposes to amend Section 73.202(b) of the TABLE of FM Allotments and reserve the channel for non-commercial use only. The amendment is as follows:

<u>Community</u>	<u>Present Allocations</u>	<u>Proposed Allocations</u>
Wynnewood, OK	None	283A

The allotment of FM Channel 283A to Wynnewood would be its first aural assignment. Wynnewood is a city in Gavin county, with a population of 2,393 people. The population figure was taken from the 1990 Census of Population and Housing (Booklet 1990 CPH-138) published by the Bureau of the Census. The proposed allotment of Channel 283A will work from the reference coordinates of Wynnewood, without the imposition of any site restrictions. The reference coordinates of Wynnewood are as follows:

North Latitude: 34° 38' 36"
West Longitude: 97° 09' 51"

TABLE I is an FM channel study listing all stations, applications, allocations and proposed rule makings of co-channel and adjacent channel assignments pertinent to allocating Channel 283A to Wynnewood, Oklahoma.

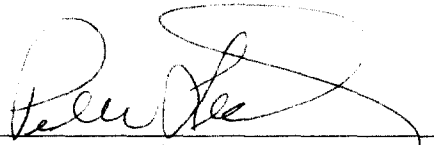
Lechman & Johnson, Inc.

**DECLARATION
ENGINEERING STATEMENT**

Upon the assignment by the Commission to allot FM Channel 283A to Wynnewood, Oklahoma, Suelou, Inc. will pursue the assignment.

I declare under penalty of perjury that the foregoing is true and correct.

LECHMAN & JOHNSON, INC.



Peter W. Lechman
Consulting Engineer
August 24, 1998

Lechman & Johnson, Inc.

TABLE I

***** FM CHANNEL STUDY NO. 1 - LECHMAN & JOHNSON, INC. GAITHERSBURG, MARYLAND - 20-AUG-98 18:24:19 *****
 ***** LAST UPDATE: 980817 *****

NEW 283 A FM POLARIZATION ERP (KW) HAAT RCANSL
 WYNEWOOD OK US HOR PLN BM TILT (METER) (METER)
 34.3836 97.0951 (D.MMSS) HORIZONTAL 6.000 0.000 100.0
 VERTICAL 6.000 0.000 100.0

THE FOLLOWING CONTOURS ARE CALCULATED USING:

CALCULATED HAAT FROM TOPO DATA BASE

ERP= 6.000 (KW) 7.8 (DBK) HAAT= 100.0 (METERS)

INTERFERING	DOMESTIC	AZIMUTH	HAAT	HAAT	CONTOURS (KM)
	DBU KM	DEGREES	(METERS)	(FEET)	70 DBU 60 DBU
CO CHANNEL (40.0)	86.7	0.0	115.0	377.3	17.5 30.2
1ST ADJACENT (54.0)	43.7	45.0	91.3	299.5	15.3 27.1
2ND ADJACENT (80.0)	9.1	90.0	74.3	243.8	13.8 24.6
3RD ADJACENT (100.0)	2.8	135.0	97.4	319.6	15.9 27.9
		180.0	134.8	442.2	19.0 32.3
		225.0	104.5	343.0	16.6 28.9
PROTECTED (60.0)	28.3	270.0	85.4	280.2	14.8 26.3
		315.0	97.2	319.0	15.9 27.9
CITY GRADE (70.0)	16.2	AVERAGE	100.0	328.1	16.2 28.3

EST SITE ELEVATION : 274.7 m.; 901.2 ft.
 EST RAD CENTER AGL : 106.1 m.; 348.2 ft.
 RAD CENTER A.M.S.L.: 380.8 m.; 1249.4 ft.

AZIMUTH	LAT	LONG	ERP (KW)	HAAT	D I-CON	F-CON	IR	IC	REZLT
FROM TO CALL STS	FILE NUMBER	CITY	ST C	(D.MMSS)	REL CHN	HORZ VERT	(M)	A F5010 F5050	DIST RSEP RSEP IR IC
								(KM) (KM) (KM) (KM) (KM)	
343.8 163.6 KMGL LIC	BLH820830AH	Oklahoma	OK A	35.3258	97.2918 2ND 281C	100.B100.B	415		104.8 95.
175.4 355.5 KKDAFM LIC	BLH821029AL	Dallas	TX A	32.3522	96.5810 CO 283C	100.B100.B	485		228.5 226. C
175.6 355.7 KKDAau LIC	BLH960315KA	Dallas	TX A	32.3517	96.5834 CO 283C	52.H 52.V	378		228.6 226. C
41.4 222.2 KMYZFM LIC	BLH850501KY	Pryor	OK A	36.0110	95.3924 CO 283C1	70.H 70.V	344		205.2 200. C
316.2 135.0 ADD	RM9133	Mooreland	OK A	36.2124	99.1337 CO 283C1	H V			266.8 200.
COMMENTSite Restriction 9.3km South-Alternate Channel									
239.2 58.4 KYIau LIC	BLH941220KD	Burkburne	TX A	33.5630	98.3407 1ST 284C	.740H.740V	87		150.9 165. *** S
COMMENT*To channel 284C1									
249.2 68.3 KYI LIC	BLH881118KA	Burkburne	TX A	34.0535	98.5244 1ST 284C	100.H100.V	310		169.1 165. C
COMMENT*To channel 284C1									
249.2 68.3 KYI CP	BFH980115IC	Burkburne	TX A	34.0535	96.5244 1ST 284C1	92.H 92.V	310		169.1 133.
COMMENTFrom Channel 284C									
48.5 228.9 KWSHFM LIC	BLH971211KC	Wewoka	OK A	35.0531	96.3229 1ST 284A	1.7H 1.7V	1540		75.6 72. C
308.0 127.8 KBLF LIC	BLH960415KL	Lindsay	OK A	34.5401	97.3356 3RD 286A	2.00H2.00V	172		46.5 31.

DOCKET87-151 **

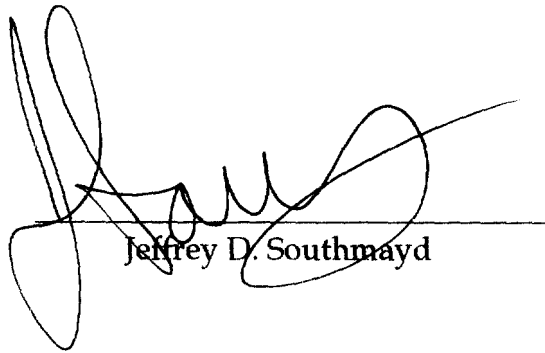
*** NOT REQUIRED TO PROTECT KYI's AUXILIARY FACILITY.

Lechman & Johnson, Inc.

CERTIFICATE OF SERVICE

I, Jeffrey D. Southmayd, do hereby certify that I have caused a copy of the foregoing to be served by first class United States mail, postage pre-paid, on the following on this 21st day of September, 1998.

Mr. Roy Floyd
President
Wright & Wright, Inc.
P.O. Box 248
Bonham, Texas 75418



Jeffrey D. Southmayd